EXHIBIT

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RG

From: **Russell Greer** russmark@gmail.com
Subject: Re: Activity in Case 2:24-cv-00421-DBB-JCB Greer v. Moon et al Motion to Compel
Date: December 12, 2024 at 10:03 PM
To: Matt Hardin matthewdhardin@gmail.com

My motion is pretty clear what I seek. It complied with DUCivR 7-1. It says what is sought pretty clearly. It gives the facts. Your client has not paid me and before we get lost in further litigation, I want what is owed to me.

Don't be like this. Just pay me the awarded money,

Sent from my iPhone

> On Dec 12, 2024, at 6:40 PM, Matthew Hardin <matthewdhardin@gmail.com> wrote:
>
> Good afternoon, Mr. Greer.
>
> I wanted to follow up on my December 11, 2024 email below because I have not heard from you. Are you declining to meet and confer pursuant to Rule 37-1 regarding the portions of your motion at ECF No. 190 that appear to relate to discovery? If you are not declining, do you have three available dates to propose for the conference?
>
> Also: I note that I have not heard from you with respect to the Requests for Production sent on November 20. I therefore assume that you have no concerns as to ambiguity or burden within the meaning of paragraph J of the instructions. Please let me know if that assumption is incorrect.
>
> Lastly, what would be the Plaintiff's position on modifying the scheduling order so that we are given an additional month to conduct discovery as a result of the unjustified delays the Court recognized in its December 9, 2024 order (ECF No. 189). Defendants believe that some remedy is needed so that we are not prejudiced by the ongoing delay in receiving your initial disclosures, and we hope you would not object to such a request.
>
> Merry Christmas,
>
> **Matthew D. Hardin**
> **Hardin Law Office**
> Direct Dial: 202-802-1948
> NYC Office: 212-680-4938
> Email: MatthewDHardin@protonmail.com
>
>> On Dec 11, 2024, at 3:56 PM, Matthew Hardin <matthewdhardin@gmail.com> wrote:
>>
>> Good afternoon,
>>
>> Among other things, we'd like to discuss your proposed discovery methods and scope, your belief that Lolcow LLC is subject to discovery notwithstanding that it was not a party at the time of the Tenth Circuit appeal or remand,, what rule or decision you believe authorizes your proposed mechanism of discovery, whether it is your position that payment will constitute abandonment/waiver of appellate rights, whether you consent to or oppose entry of a supersedes bond, and whether you object to payment of funds into a Court registry as per Newman v. Nelson, 350 F.2d 602, 605 (10th Cir. 1965), so that we can later recoup those funds when we are awarded our costs and fees at the conclusion of the Case under Fed. R. Civ. P. 54 (d).
>>
>> Do I take it you now agree to a conference under Rule 37-1 and will be proposing dates?
>>
>> Merry Christmas,
>>
>> **Matthew D. Hardin**
>> **Hardin Law Office**
>> Direct Dial: 202-802-1948
>> NYC Office: 212-680-4938
>> Email: MatthewDHardin@protonmail.com
>>
>>> On Dec 11, 2024, at 2:32 PM, Russell Greer <russmark@gmail.com> wrote:
>>>
>>> Matthew,
>>>
>>> I have tried reaching out 3 times over the past 3 years for money owed to me. What is there to discuss on that end? Simply just pay me the money awarded to me. Does Moon not have it?
>>>
>>> Sent from my iPhone
>>>
>>>> On Dec 11, 2024, at 8:26 AM, Matthew Hardin <matthewdhardin@gmail.com> wrote:
>>>>
>>>> Good morning, Mr. Greer.

I was surprised to see the below motion from you, which appears to seek discovery but does not comply with DUCivR 37-1. That rule requires that if there is a discovery dispute, you are required to meet and confer with me prior to filing a motion.

To the extent that your motion does not seek discovery, it appears not to comport with DUCivR 7-1 (a), which requires your motion to be accompanied by a memorandum setting forth the authority upon which you rely. I am unable to respond to a motion that does not cite to any applicable legal authority (rules of civil procedure, court decisions, etc.).

I therefore write to ask whether you intend to meet the requirements of DUCivR 37-1 or 7-1 (a), including the specific requirements that you provide three available dates for a conference and the requirement that you cite the applicable legal authority to which we are responding. If you intend to engage in any meet and confer regarding any discovery dispute (and we note that we have not received any discovery requests from you), we would be happy for you to withdraw your motion and re-file after the conference is over.

Merry Christmas,

Matthew D. Hardin
Hardin Law Office
Direct Dial: 202-802-1948
NYC Office: 212-680-4938
Email: MatthewDHardin@protonmail.com

On Dec 11, 2024, at 10:25 AM, utd_enotice@utd.uscourts.gov wrote:

This is an automatic e-mail message generated by the CM/ECF system. If you need assistance, call the Help Desk at (801)524-6100.
NOTE TO PUBLIC ACCESS USERS Judicial Conference of the United States policy permits attorneys of record in a case to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing.

US District Court Electronic Case Filing System

District of Utah

Notice of Electronic Filing

The following transaction was entered on 12/11/2024 at 8:25 AM MST and filed on 12/11/2024

Case Name:	Greer v. Moon et al
Case Number:	2:24-cv-00421-DBB-JCB
Filer:	Russell G. Greer
Document Number:	190

Docket Text:
MOTION for Entry of an Order Compelling Joshua Moon and Lolcow LLC to Appear for a Judgment Debtor Examination and Produce Documents filed by Plaintiff Russell G. Greer. Motions referred to Jared C. Bennett.(kpf)

2:24-cv-00421-DBB-JCB Notice has been electronically mailed to:

Matthew D. Hardin   matthewdhardin@gmail.com, matthewdhardin@ecf.courtdrive.com, matthewdhardin@protonmail.com

Russell G. Greer   russmark@gmail.com

2:24-cv-00421-DBB-JCB Notice has been delivered by other means to:

The following document(s) are associated with this transaction:

Document description: Main Document
Original filename:n/a
Electronic document Stamp:
[STAMP dcecfStamp_ID=1060034973 [Date=12/11/2024] [FileNumber=5994438-0] [a73caef7458ec9f845b81c6824ae50bbb1eabe62b43c04811c49ba63c1af58cfca f3a914677e9358215456aa41a45f6b1b5a854bc7b67c90fa9a3fffa45f7da7]]